

## **REMARKS**

### **Introduction**

Claims 1, 11, and 21 have been amended. The application continues to include claims 1-21 and 25.

Applicants thank the Examiner for taking the time to conduct a personal interview with the Applicants' representative on Aug. 19, 2008. Reconsideration of the rejection is respectfully requested in view of the claim amendments and following remarks.

### ***Claim Objections***

Claims 1, 11, and 21 were objected to for having informalities. Applicants respectfully submit that the amendments to claims 1, 11, and 21 correct any alleged informalities and that the objections are now moot.

### ***Rejections under 35 U.S.C. § 101***

Claim 21 was rejected as allegedly directed to non-statutory subject matter. Applicants reiterate the traversal of this rejection made in the response filed April 29, 2008. Applicants regret this rejection was not discussed further in the Interview. However, the Examiner does not make clear in the Official Action how Figure 5 and page 16, lines 1-19, do not describe enabling hardware to support realization of software functionalities. Further explanation or withdrawal of the rejection is requested.

***Rejections under 35 U.S.C. § 112, First Paragraph***

Claims 1-21 and 25 were rejected as allegedly failing to comply with the written description requirement. The Examiner contends that the "second pass through" recited in claims 11 and 21 is not described in the specification. The Examiner also rejects claims 1, 11, and 21 for the reasons stated in the Objection to the Claims. Applicants respectfully submit that the amendments to claims 1, 11 and 21 render this rejection moot.

***Rejections under 35 U.S.C. § 103***

Claims 1-21 and 25 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over W3C, "XML Path Language (XPath)" and "XSL Transformation (XSLT)" Version 1.0, *W3C Recommendation*, November 16, 1999 (hereinafter "W3C") in view of Renner et al. (U.S. Pat. No. 6,993,657; hereinafter "Renner"). This rejection is traversed with respect to the amended claims.

**The Prior Art does not teach executing statements in accordance with execution flow descriptors.**

One embodiment of the invention is a system for cell based data processing in accordance with an execution flow description. Data processing cell specifications specify a plurality of statements (e.g., a formula) in a data processing cell. Sometimes a first data processing cell may be dependent upon information in a second data processing cell. Accordingly, an embodiment analyzes the first data processing cell, determines its dependencies, and

generates execution flow descriptors that specify how the data processing cells should be executed. Thus, in a first data processing cell, a dependency on another cell may result in processing statements in the data processing out of order. Instead of executing the data processing cell "as-is," the statements are executed in accordance with an order specified by the execution flow descriptors. See, e.g., page 14, lines 8-23 of the patent application.

In contrast with this embodiment, applicants respectfully submit that the prior art does not teach or suggest

"generating one or more execution flow descriptions describing the execution order of said plurality of statements of said first data processing cell specification based on results of the determination, wherein an execution order of the execution flow descriptions is different from an order of the plurality of statements in said first data processing cell specification." (Amended Claim 1)

Applicants respectfully submit that neither W3C nor Renner teaches or suggests this limitation because neither reference teaches executing statements in accordance with an execution flow description that was generated through an interdependency analysis. Nothing in either reference suggests that XML statements are processed out of order or in accordance with dependency requirements.

This limitation is recited by claim 1; claims 11 and 21 recite similar limitations. For at least these reasons, amended claims 1, 11, and 21 should now be allowable over the cited prior art. The remaining claims depend from

either claim 1, 11 or 21, and should also be allowable for at least the above reasons.

***Conclusion***

Applicants respectfully request favorable action in connection with this application.

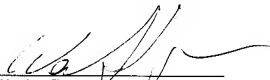
The Examiner is invited and urged to contact the undersigned to discuss any matter concerning this application.

No fee is believed to be due for this submission. Should a fee be required, the Commissioner is authorized to charge any such fee to Womble Carlyle's Deposit Account No. 09-5028.

Respectfully Submitted,

Date: \_\_\_\_\_

9/30/08



A. Wesley Ferrebee (Reg. No. 51,312)  
Womble, Carlyle, Sandridge & Rice  
P.O. Box 7037  
Atlanta, GA 30357-0037  
202-857-4575